

THE STATE OF NEW HAMPSHIRE
CHESHIRE, SS.

SUPERIOR COURT

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STATE OF NEW HAMPSHIRE *
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v. *
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GORDON MacRAE *
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INTERVIEW OF THOMAS A. GROVER

Interview taken by agreement of counsel at
the Cheshire County Attorney's Office, 12
Court Street, Keene, New Hampshire, on
Friday, September 2, 1994, commencing at
3:05 p.m.

Court Reporter:

Sandra Lee Kulacz, CSR, CM

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8 For the Defendant:

9 BRAGDON, BERKSON & DAVIS,
10 PROFESSIONAL CORPORATION
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14 Also Present:

15 Ira H. Cook, Investigator
16 Exeter, NH

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1 (The following interview of
2 Thomas A. Grover was taken:)

3 | QUESTIONS BY MR. DAVIS:

4 Q. Hi, my name is J. R. Davis, I'm one of
5 the attorneys that represent Gordon MacRae.

6 MR. REYNOLDS: It's just questions here,
7 just an interview. Let's just do questions, just
8 cut right to the chase.

9 Q. Would you prefer that I call you Mr.
10 Grover or Tom?

11 A. Mr. Grover.

12 Q. Okay, Mr. Grover, would you please tell
13 us where you're living now?

14 MR. REYNOLDS: No, he won't tell you
15 where he's living. Manchester, New Hampshire.

16 MR. DAVIS: Is there a reason why we
17 can't find out his address?

21 MR. DAVIS: Well, I guess the thing to
22 do is let's start by seeing how many questions I
23 can get answered, then maybe we can put together

1 the ones that are objected to.

2 MR. REYNOLDS: Okay.

3 Q. Could you tell us how long you've lived
4 at your current address?

5 A. Less than three months.

6 Q. Okay, do you know the date you moved?

7 A. The exact date, no.

8 Q. Do you know which month you moved?

9 A. I believe it was June.

10 Q. Of 1994?

11 A. Yes.

12 Q. Okay. And where did you move from?

13 A. I moved from 452 Pine Street,
14 Manchester, New Hampshire.

15 Q. Is that a house or an apartment or --

16 A. Apartment.

17 Q. Do you know what the apartment number
18 was?

19 A. Number 13.

20 Q. Do you know who your landlord was?

21 A. I'm not sure what his first name was,
22 but his last -- it's GAMACHE.

23 Q. Any idea how to spell that?

1 A. G A M A C H E.

2 Q. Did you pay the rent to him or to
3 somebody else?

4 A. No, there was an on-site manager, paid
5 the rent to Dick Fortin, F O R T I N.

6 Q. And that was an on-site manager?

7 A. Yes, on-site manager.

8 Q. Did he actually live there?

9 A. Yes, he actually lived there.

10 Q. Okay. How long did you live there?

11 A. Less than a year.

12 Q. And did you live in the apartment at
13 number 13 at 452 Pine Street with anyone else?

14 A. No.

15 Q. Okay, so you lived by yourself the
16 entire time?

17 A. Yes.

18 Q. Do you live by yourself now?

19 A. No.

20 Q. You live with someone else?

21 A. Yes.

22 Q. Would you be willing to tell us who?

23 A. No.

1 Q. Okay. Is it more than one person?

2 A. It's a family.

3 Q. Before you lived at 452 Pine Street,
4 where did you live?

5 A. 96 Prospect.

6 Q. In Manchester or Keene?

7 A. Yes, Manchester, New Hampshire.

8 Q. House or an apartment?

9 A. Apartment.

10 Q. And who was your landlord there?

11 A. Michael Terry.

12 Q. Did he actually collect the rent or did
13 someone else?

14 A. He actually collected it.

15 Q. Okay, when you were at 96 Prospect
16 Street, do you remember what the apartment number
17 was?

18 A. I believe it was 2.

19 Q. Did you live with anyone else there?

20 A. Yes, I did.

21 Q. Okay, and who did you live with at 96
22 Prospect Street?

23 A. How important is that?

1 Q. Well, I think it's important and
2 relevant.

3 A. I lived with Shannon Curtis,
4 S H A N N O N .

5 Q. Curtis?

6 A. Yes.

7 Q. Was that a man or a woman?

8 A. Man -- it's a woman, it's a lady.

9 Q. Did -- I may have misunderstood, did
10 Shannon have a sex change operation or did I just
11 --

12 A. No.

13 Q. Always been a woman?

14 A. Yeah, always.

15 Q. And excuse me for asking, but were you
16 all just every day friends or were you all any
17 kind of special friends?

18 A. I'd rather not answer that.

19 Q. Do you know when you moved into --
20 excuse me, 96 Prospect Street?

21 A. I think it was August of '82 -- no, it
22 was August of '81.

23 MR. REYNOLDS: '81 or '91?

1 A. '91.

2 Q. So you lived there from approximately
3 August of '91 until you moved to Pine Street in
4 Manchester?

5 A. No, I lived there, then moved out for
6 about a year.

7 Q. Do you know when you moved out?

8 A. No; I'm not sure when that was, but in
9 that period since '91, August of '91 until late in
10 '93 I had already moved out of there at one time
11 for a year and then moved back to 96 Prospect, I
12 moved to 452 Pine.

13 Q. Did Shannon Curtis live with you the
14 entire time you were at Prospect Street?

15 A. Yes. She's lived there since August of
16 1991 when we moved in together. She's lived there
17 since that time. I've moved out and I moved back
18 in, and then moved out and then --

19 Q. And stayed out?

20 A. Right.

21 Q. The time you moved out you were gone for
22 about a year?

23 A. Yeah, I'd say approximately a year.

1 Q. Do you know when that was?

2 A. I don't know, I believe that was in '92.

3 Q. Any idea --

4 A. From what date to what date, I really
5 don't know offhand.

6 Q. And when you moved out, where did you
7 live?

8 A. 452 Pine, same as -- I've lived there
9 twice.

10 Q. Okay, was it apartment number 13 both
11 times?

12 A. No, it was 11.

13 Q. The first time?

14 A. The first time.

15 Q. Was Mr. Fortin the on-site property
16 manager both times?

17 A. Yes, he was.

18 Q. Okay, and the first time you lived at
19 Pine Street, did you live by yourself?

20 A. Yes, I did.

21 Q. Do you remember where you lived before
22 Prospect Street?

23 A. No, not right offhand. There is a new

1 manager there, though, at 452 Pine, I'm not sure
2 what his name is, but he was there a month before
3 I left, I don't know, three weeks before I left,
4 so I didn't really -- Dick Fortin is not the
5 manager there anymore.

6 Q. Someone replaced Mr. Fortin?

7 A. Right.

8 Q. But before you went to Pine Street, you
9 lived at Prospect Street?

10 A. Right.

11 Q. And my question -- and you think you
12 moved to Prospect Street the first time about
13 August of 1991, is that right?

14 A. Right.

15 Q. Do you know where you lived before then?

16 A. No, not right offhand.

17 Q. Okay, do you know how long you've lived
18 in Manchester?

19 A. I don't know, less than four years.

20 Q. Okay, now, it's September 1994 now?

21 A. Right. More than four years, I am not
22 sure, I can't say.

23 Q. Okay. When you moved to Manchester,

1 where did you move from?

2 A. I moved from -- I'm not sure -- it was
3 from one of my parents' addresses.

4 Q. And who are your parents?

5 A. Patricia Grover of Keene and Elmer
6 Grover of Marlborough.

7 Q. Okay, so when you moved to Manchester,
8 you had moved either from your mom's place or your
9 dad's place?

10 A. Right, correct.

11 Q. When you first -- was that the first
12 time you lived in Manchester?

13 A. No, that wasn't.

14 Q. Okay, all right, this last time that you
15 moved to Manchester, we know you lived at Pine
16 Street, we know you've lived at Prospect Street,
17 and you live some place now which you just soon
18 not tell us about, other than those three places,
19 any place else that you lived in Manchester that
20 you can remember?

21 A. Well, I went -- yeah, I mean I lived
22 there in the eighties.

23 Q. Okay, let's just take it from the second

1 time you moved to Manchester.

2 A. Right.

3 Q. Once you left your dad or your mom's --

4 A. I was in some different programs in
5 Manchester.

6 Q. Which programs were you in?

7 A. I was in -- I stayed at Sobriety
8 Maintenance until I got into Farnum Center.

9 Q. When you say Sobriety Maintenance, is
10 that the name of a program or a place or is that a
11 kind of program?

12 A. No, that is the name of it.

13 Q. And do you know where that is?

14 A. No. I know the old -- well, it used to
15 be on Hanover Street at the time.

16 Q. Do you know where it is now?

17 A. I think it's just one street over, I'm
18 not sure, though, if that's the exact location.

19 Q. But you think it's moved?

20 A. I know it's moved.

21 Q. And it used to be at Hanover Street?

22 A. Yup.

23 Q. And it's called Sobriety Maintenance?

1 A. Yes.

2 Q. Okay, any idea when you were in that
3 program?

4 A. No, whatever year that was, that I moved
5 to Manchester.

6 Q. Any idea how long you were in it?

7 A. No.

8 Q. Did you have -- what was the program
9 about?

10 A. It's a substance abuse program.

11 Q. And was this for alcohol or drugs or
12 something else?

13 A. No, alcohol.

14 Q. And do you remember if you had a primary
15 counselor or treating psychologist or psychiatrist
16 there?

17 A. No, the executive director, Lou, I'm not
18 exactly sure, I don't remember what her last name
19 was.

20 Q. Was it a man or a woman?

21 A. It's a lady.

22 Q. Okay. And her nickname was Lou?

23 A. Yeah, her first name was probably Louise

1 -- Gifford.

2 Q. Gifford?

3 A. (Nods affirmatively).

4 Q. G I F F O R D maybe?

5 A. Yeah, yeah.

6 Q. And do you know if she's a psychiatrist
7 or psychologist or social worker or do you know?

8 A. I think she heads the New Hampshire
9 Council on Drugs and Alcohol.

10 Q. And you were at Sobriety Maintenance the
11 last time that you moved to Manchester, is that
12 right?

13 A. The last time -- yeah.

14 Q. Because how many different times have
15 you lived in Manchester?

16 A. Three different times.

17 Q. Okay. Have you been in any other what
18 we call programs in Manchester other than Sobriety
19 Maintenance at any time?

20 A. Yes.

21 Q. Okay, what were the other programs?

22 A. The Farnum Center.

23 Q. Where is that?

1 A. It's on Hanover Street.

2 Q. Any idea when you were at the Farnum
3 Center?

4 A. No.

5 Q. Was it the most recent time you moved to
6 Manchester or before then?

7 A. The most recent time.

8 Q. Okay, do you know if it's still at
9 Hanover Street?

10 A. Yes, it's still there.

11 Q. Is it all right if I take my coat off?

12 A. It's fine.

13 Q. I have too much insulation. Did you
14 have a lead counselor or person that you dealt
15 with mainly there or do you remember?

16 A. Yeah, I did, but -- I'm not -- I don't
17 recall his name offhand.

18 Q. But it was a man?

19 A. Yes, it was a man.

20 Q. And were you there also because of a
21 problem with alcohol?

22 A. Yeah, the reason why I was at Sobriety
23 Maintenance, was it's a hold-over. Like you go

1 there and wait until -- it's kind of like just a
2 waiting area for people to go to different
3 programs wherever they may be going.

4 Q. And was Farnum Center the program you
5 went to after Sobriety Maintenance?

6 A. Right, I went right from Sobriety
7 Maintenance to the Farnum Center.

8 Q. And how many times were you at the
9 Sobriety Maintenance, just the one time?

10 A. Yeah, one time.

11 Q. And were you only at Farnum Center one
12 time?

13 A. Yes, I was.

14 Q. And after Farnum Center did you have any
15 other treatment or programs?

16 A. Yeah, I went to Tirrell House.

17 Q. Now, that was the second time you've
18 been to Tirrell House?

19 A. Yes.

20 Q. Were you there earlier sometime in the
21 1980's?

22 A. Yes.

23 Q. Do you remember the names of the

1 counselor or counselors that you had either time
2 you were at Tirrell House?

3 A. No, the only person I can refer you to
4 there is Al Cohen, I think it's C O H E N, or
5 Coburn, C O B U R N, one of those two.

6 Q. That's somebody you dealt with?

7 A. Yeah.

8 Q. Do you know if he was like a counselor
9 or do you know?

10 A. No, he's a director there. He would
11 know who the counselor was. I had a number of
12 them there.

13 Q. Do you know the dates that you were at
14 the Farnum Center?

15 A. No.

16 Q. Do you know the dates you were at
17 Tirrell House?

18 A. No.

19 Q. Have you had any programs in Manchester
20 at any time, or treatment at any time other than
21 Sobriety Maintenance, the Farnum Center or Tirrell
22 House?

23 A. No.

1 Q. Okay, do you have any maintenance or any
2 type of treatment or program that you're going to
3 now?

4 A. Well, no, not -- no, I mean I go to
5 counseling, but that's totally different, I mean
6 that has nothing to do with any of those things.

7 Q. Okay, what kind of counseling do you go
8 to now?

9 A. I see a psychotherapist.

10 Q. And what's the name of the person you
11 see?

12 A. Pauline Goupil, G O U P I L.

13 Q. And she's a psychologist?

14 A. Psychotherapist.

15 Q. And where is she?

16 A. She works for New Life Center.

17 Q. New Life?

18 A. New Life.

19 Q. Do you know where that is?

20 A. I'm not sure of the exact number, but
21 it's on Canal Street.

22 Q. In Manchester?

23 A. Yes.

1 Q. Okay, and you're going to her now?

2 A. Yes.

3 Q. And how long, if you know, have you been
4 seeing Ms. Goupil?

5 A. I don't know, since the spring of '93.

6 Q. And how often do you see her?

7 A. As often as I want to go to her office.

8 Not really on a regular schedule where anybody
9 says I have to go at any certain time, I just --
10 when I want to go, then I just go.

11 Q. Any idea when you saw her last?

12 A. Last week.

13 Q. Okay. Have you had any other counseling
14 or treatment, whether it's just for alcohol or for
15 any other kind of thing that's bothering you --

16 A. I saw another doctor.

17 Q. Who was that?

18 A. Psychiatrist, and that was just a
19 one-time evaluation.

20 Q. Do you remember who that was?

21 A. Yeah, Ram Yaditi, R A M Y A D I T I, I
22 think that's how you spell it.

23 Q. His first name is Ron?

1 A. Ram, R A M.

2 Q. Help me with the last name, I realize
3 you may not be able to spell it?

4 A. Y A D I T I.

5 Q. You saw him one time?

6 A. Yeah, I was evaluated by him.

7 Q. Do you remember when that was?

8 A. No.

9 Q. Why were you evaluated, if you know?

10 MR. REYNOLDS: Just so that you're
11 aware, Tom, this may be an area of privilege for
12 you. I don't know, I'm not your lawyer, but I
13 don't know that you've waived any rights with
14 regard to this particular privilege, but if you
15 answer the question now, that may be considered a
16 waiver.

17 A. All right.

18 Q. Do you know why you saw Mr. Yaditi?

19 A. No.

20 Q. Okay. Did someone send you to him?

21 A. I don't recall.

22 Q. Do you remember how you got his name?

23 A. It was -- I'm not sure, I had a

1 conversation with someone and they suggested it,
2 but who that person was, I'm not sure exactly
3 whose idea it was.

4 Q. And you don't know why you saw Mr.
5 Yaditi?

6 A. No, I don't.

7 Q. Was that before you started seeing, is
8 it Pauline Goupil?

9 A. No, it was during the time.

10 Q. So you saw him and he's a psychiatrist?

11 A. Right.

12 Q. And he evaluated you?

13 A. Right.

14 Q. But you're not sure who suggested you
15 see him or why?

16 A. That was a conversation between other
17 people -- it wasn't -- no, I don't know how that
18 came about.

19 Q. Okay, do you know where his report or
20 evaluation went, if anywhere?

21 A. I have no idea about that either.

22 Q. And do you have any idea when that was?

23 A. No, I don't have any idea when that was

1 either.

2 Q. Have you been in any programming,
3 whether it was because of alcohol problems or
4 other mental or psychological problems you were
5 having in Manchester other than at Sobriety
6 Maintenance, Farnum Center, and Tirrell House?

7 A. No.

8 Q. Have you seen any psychologists or
9 psychiatrists or counselors or anyone like that in
10 Manchester other than Pauline Goupil and Ram
11 Yaditi?

12 A. No.

13 Q. Okay. And right now the only treatment
14 person like that you're seeing is Pauline Goupil?

15 A. Right.

16 Q. Okay. Now, when you moved to Manchester
17 the last time, you're not exactly sure when that
18 was, is that right?

19 A. Correct.

20 Q. And you're not sure whether you'd moved
21 from your dad's or from your mom's, is that
22 correct?

23 A. Right.

1 Q. Okay. Why did you move?

2 A. Employment purposes.

3 Q. Had a job in Manchester?

4 A. No, but I had more of an opportunity to
5 get a job in Manchester than in Marlborough, New
6 Hampshire.

7 Q. Or Keene?

8 A. Right.

9 Q. Okay. When you were in Marlborough or
10 Keene the last time that you lived, did you have a
11 job?

12 A. Yes.

13 Q. And where was that?

14 A. I worked for my father, the town of
15 Marlborough signs the checks for as far as the
16 town of Marlborough.

17 Q. You did maintenance or what?

18 A. Yeah, landscaping.

19 Q. For, do you know which department?

20 A. No.

21 Q. Was it like the highway department or
22 the cemetery trustees?

23 A. It was the trustees, yeah, cemeteries,

1 take care of.

2 Q. Did you work at the cemeteries?

3 A. Yeah.

4 Q. Do you know who your boss was?

5 A. Yeah, my father.

6 Q. Oh, duh. And have you had any jobs
7 since you lived in Manchester?

8 A. Yeah, I have.

9 Q. I just like to go through those. Will
10 it be easier for you if we go from your first job
11 in Manchester to the present or if we go from
12 today backwards, which would be easiest to figure
13 it out for you?

14 A. I think probably going from when I moved
15 there to the present.

16 Q. What was the first job you had in
17 Manchester the second time -- excuse me, the last
18 time you moved there?

19 (Pause.)

20 A. I don't know who the first job -- oh
21 yeah, it was for Hawthorne Property Management.

22 Q. And what did you do for them?

23 A. Remodeling.

1 Q. Do you remember when you worked for
2 them?

3 A. No.

4 Q. Do you know who the boss was, or that is
5 who you reported to?

6 A. No, I don't know, no, I just know him by
7 his first name.

8 Q. And what was that?

9 A. Dick.

10 Q. Do you know how long you worked there?

11 A. No.

12 Q. Do you know when you left?

13 A. No.

14 Q. Do you remember why you left?

15 A. No.

16 Q. Okay. Did you get fired?

17 A. I'm not sure.

18 Q. Okay. Did you collect unemployment?

19 A. No, I didn't.

20 Q. Okay. Where else have you worked in
21 Manchester -- by the way, where is Hawthorne
22 Property Management, do they have an office?

23 A. They used to be 105 Prospect.

1 Q. Do you know if they've gone out of
2 business or moved?

3 A. Their business has gone under.

4 Q. Okay, do you know who owned it?

5 A. Yeah, John Hawthorne.

6 Q. Do you know if he lived in Manchester?

7 A. No, he didn't at the time.

8 Q. Do you have any idea where he lives now?

9 A. I'm not sure.

10 Q. Okay, what other jobs have you had in
11 Manchester?

12 A. Well, let's see --

13 Q. When I say Manchester, when you were
14 living in Manchester, I don't care if the job was
15 in the next town.

16 A. Let's see, I guess I worked at Carol
17 Cable, that was the next job.

18 Q. What job?

19 A. The next job after Hawthorne.

20 Q. Carol Cable?

21 A. Yes.

22 Q. And where are they?

23 A. Megregor Street in Manchester.

1 Q. Do you know when you worked there?

2 A. No.

3 Q. Who was your boss?

4 A. I don't know what his name was.

5 Q. Do you know when you left?

6 A. No.

7 Q. Do you know how long you were there?

8 A. No.

9 Q. Do you remember why you left?

10 A. Yeah, I was hurt, I got hurt off the
11 job.

12 Q. And what happened, how did you get hurt?

13 A. It was just an off the job injury,
14 nothing worth going into, my leg was injured.

15 Q. Fall, automobile accident, trip, what,
16 somebody hit you?

17 A. Fall.

18 Q. Do you remember when that was?

19 A. No.

20 Q. Do you remember where you fell?

21 A. Where I fell, on my body?

22 Q. Where were you when you fell?

23 A. I'm not sure of the exact address or

leg
injury
fall

1 even the exact place. It was hiking.

2 Q. Were you with anyone?

3 A. I believe so.

4 Q. Do you remember whom?

5 A. No, there was -- no, I don't remember
6 offhand.

7 Q. Did you see a doctor?

8 A. Yes, I did.

9 Q. Do you remember what doctor you saw?

10 A. No.

11 Q. Do you remember where the doctor was,
12 was it a hospital?

13 A. It was Hitchcock Clinic, I originally
14 went to Hitchcock Clinic, saw Dr. Rosenthal.

15 Q. Is that a man or woman?

16 A. It's a lady.

17 Q. Do you remember her first name?

18 A. Regina.

19 Q. That was at the Hitchcock Clinic?

20 A. Yes.

21 Q. And that's -- you saw her because you
22 had hurt your leg?

23 A. Right.

1 Q. Okay, and do you remember if you saw any
2 other doctors or if you were ever in the hospital
3 for that?

4 A. Yeah, I had surgery on my leg at Elliot
5 Hospital.

6 Q. And you don't remember when that was?

7 A. No.

8 Q. Okay, was it broken, is that what it
9 was?

10 A. No, I had a bruise on my leg.

11 Q. And they had surgery for it?

12 A. Yes.

13 Q. Do you remember who the doctor was who
14 operated on you?

15 A. Nope.

16 Q. Do you remember who you saw for
17 follow-up care -- let me ask you if, after you got
18 done with your surgery, was there any follow-up
19 care, did you see the doctor anymore or any
20 doctors after that?

21 A. Yeah, I saw the same one, the same
22 doctor I saw all the time, Dr. Rosenthal.

23 Q. But she didn't do the surgery?

1 A. I don't believe so.

2 Q. Okay. Other than the job at Hawthorne
3 and Carol -- what did you do at Carol Cable, by
4 the way?

5 A. I worked in shipping.

6 Q. Do you know if they're still on Megregor
7 Street?

8 A. I believe so -- I'm not sure -- I don't
9 think it's called Carol Cable anymore.

10 Q. Do you know the new name?

11 A. No. I'm not -- I just don't think it's
12 called that anymore.

13 Q. Do you remember where it was on Megregor
14 Street, is it near an intersection or another
15 street?

16 A. Yeah, it's right at the intersection of
17 Bridge and Megregor.

18 Q. And what, when you worked there, what
19 did Carol Cable make or ship or what did they do?

20 A. Just industrial cables, TV cable, just
21 -- that's all they did, that's all they
22 specialized in.

23 Q. And how did you get along on the job?

1 A. Fine.

2 Q. Okay. Other than the job at Hawthorne
3 and Carol Cable have you had any other jobs in
4 Manchester when you've been living in Manchester?

5 A. Yeah, I worked, let's see, I had
6 temporary work through a number of places.

7 Q. You were working for an employment
8 agency and getting temporary jobs or you would
9 have a job some place for a while and a job some
10 place --

11 A. No, I just would have temporary
12 positions with different places.

13 Q. Can you tell me the names of any of
14 those?

15 A. EPE.

16 Q. And where are they?

17 A. They're on Commercial Street, I believe.

18 Q. And what do they do, or actually better
19 yet, what did you do at EPE?

20 A. To help them with their inventory.

21 Q. Do you remember who you worked for or
22 who the boss was?

23 A. No.

1 Q. Do you remember when you worked there?

2 A. No.

3 Q. Do you remember why you left?

4 A. Temporary.

5 Q. Job was gone?

6 A. Right.

7 Q. Okay, where else have you worked?

8 A. I worked for JP'S Landscaping.

9 Q. Where are they?

10 A. South River Road, Manchester.

11 Q. Chester?

12 A. Manchester.

13 Q. I'm sorry. And do you know who the boss
14 was there or who you reported to?

15 A. Jim was the boss, I also reported to
16 him.

17 Q. Do you remember his last name?

18 A. No, not offhand.

19 Q. Do you remember when you worked there?

20 A. No.

21 Q. Do you remember why you quit?

22 A. Temporary.

23 Q. Job just went?

1 A. Right.

2 Q. Okay. Have any problems at either of
3 those jobs, either EPE or JP'S Landscaping?

4 A. No.

5 Q. Any other temporary jobs?

6 A. Faulkner Landscaping.

7 Q. Do you remember where that is?

8 A. It's Daniel Webster Highway.

9 Q. Any idea where on the Daniel Webster
10 Highway?

11 A. No, I don't know the exact address.

12 Q. Tell me what it's near?

13 A. It's right next to Mr. Bee's Florist
14 Shop.

15 Q. Mr. Bee's, like --

16 A. Yeah, B E E' S.

17 Q. And any idea when you worked at Faulkner
18 Landscaping?

19 A. No.

20 Q. And do you remember who your boss was
21 there or who you reported to?

22 A. Yeah, that was Steve Faulkner.

23 Q. What did you do there?

1 A. Worked at his -- it's a nursery.

2 Q. You worked at the nursery?

3 A. Yeah.

4 Q. What kind of things did you do?

5 A. I don't know, basically just laid out
6 the plants and put the trees, things that they
7 were going to be selling, shrubbery, trees and
8 stuff out, and make sure they are watered in the
9 yard and stuff like that.

10 Q. Is that the same kind of thing that you
11 did at JP'S Landscaping?

12 A. Pretty much.

13 Q. Do you remember why you left Faulkner
14 Landscaping?

15 A. Just temporary.

16 Q. Any problems there?

17 A. No.

18 Q. Any other temporary jobs?

19 A. Yeah, I worked for Kelly Services.

20 Q. Do you remember where they are?

21 A. Yeah, they're on Bedford Farm Road,
22 Bedford Farm.

23 Q. Is that in Manchester or Bedford?

1 A. It's in Bedford.

2 Q. Okay, and do you remember who the boss
3 was or who you reported to?

4 A. Colleen Gages.

5 Q. Do you remember when you worked there?

6 A. Just worked there a couple weeks ago.

7 Q. Do you remember how long?

8 A. For how long?

9 Q. Yes.

10 A. No.

11 Q. Are you still working there?

12 A. When -- yeah, when they have
13 assignments.

14 Q. They call you, you call them or what?

15 A. Either or.

16 Q. Do you have any other jobs right now
17 other than working at Kelly Services?

18 A. Yeah, I worked for Manchester Manpower.

19 Q. Do you remember when that was?

20 A. No.

21 Q. What did you do there?

22 A. Went on temporary assignments.

23 Q. And is Manchester Manpower like a

1 temporary agency?

2 A. Yeah, yes, it is.

3 Q. Okay. Do you remember when you worked
4 with or through Manchester Manpower?

5 A. No.

6 Q. Where are they located?

7 A. Chestnut Street in Manchester.

8 Q. And do you remember who the boss was or
9 who you reported to?

10 A. I know Michelle answers the phone.

11 Q. Do you remember why you left them?

12 A. Just temporary work, job ended.

13 Q. Did you ever have any problems with them
14 or the people that they had you work for?

15 A. No.

16 Q. Okay, so right now do you have any
17 regular employment?

18 A. Nope.

19 Q. Okay, so when you work now, it is, at
20 least at this point, it would be because you're
21 working with Kelly Services?

22 A. Yes.

23 Q. And what do you do at Kelly Services?

1 A. Go on whatever assignments they thought
2 was suitable for me.

3 Q. What kind of things are those?

4 A. I don't have any idea how they go about
5 choosing them.

6 Q. What have you done for them?

7 A. Light industrial work.

8 Q. Can you tell me the places you've worked
9 for Kelly Services?

10 A. No.

11 Q. I'm sorry?

12 A. No.

13 Q. Okay. Can you tell me, when you say
14 light industrial work, can you tell me exactly
15 what it was you did?

16 A. Just worked in a warehouse.

17 Q. Okay, was it their warehouse or someone
18 else's?

19 A. Someone else's.

20 Q. So they're like a temporary agency?

21 A. They are a temporary agency.

22 Q. Other than the employers that we've
23 talked about, have you had any other employers in

1 Manchester, when you've lived in Manchester that
2 is?

3 A. Granite State Parking.

4 Q. Do you remember when you worked for
5 them?

6 A. No.

7 Q. Do you remember how long?

8 A. No.

9 Q. Do you remember who the boss was?

10 A. My supervisor?

11 Q. Yes.

12 A. Skip Vincent.

13 Q. And where is Granite State Parking?

14 A. Hancock Street in Manchester.

15 Q. Do you remember why you left?

16 A. No.

17 Q. And you don't remember when?

18 A. No.

19 Q. Any other jobs when you've lived in
20 Manchester?

21 A. Yeah, I worked for another place, but I
22 really don't know, I had forgotten what the name
23 of it was.

1 Q. Do you remember where it was?

2 A. I think it was on -- I believe it was on
3 Pine Street. John Hawthorne, he had something to
4 do with it. I'm not sure if he's a part owner or
5 what, what his role in it is, but it's a property
6 management outfit.

7 Q. Was that before or after you worked for
8 Mr. Hawthorne?

9 A. That was after.

10 Q. Do you remember why you left?

11 A. Temporary work, just one project. When
12 that project was done, that's all.

13 Q. And what did you do for them?

14 A. I landscaped some property in Bedford.

15 Q. Okay. Any other jobs since you've lived
16 in Manchester?

17 A. No, I don't believe so.

18 Q. Okay.

19 A. Oh, yeah, IDS.

20 Q. IDS?

21 A. Yeah.

22 Q. And what did you do for them?

23 A. Well, I helped them relocate, and then I

1 | worked as -- I pulled orders for them

2 Q. Where are they?

3 A. Megregor Street.

4 Q. Do you remember who your boss was or who
5 you reported to?

6 A. No, I don't.

7 Q. And do you remember when you worked
8 there?

9 A. None

10 Q. Remember when you left?

11 A. N. Q.

12 Q. Do you remember why you left?

13 A. No.

14 Q. Okay. Any other jobs while you lived in
15 Manchester?

16 A. Nope -- no.

17 Q. When you were living with either your
18 mother or your father before you moved to
19 Manchester the last time, did you have any jobs
20 other than working for the cemetery trustees in
21 the town of Marlborough?

22 A. N.O.

23 Q. It was for the town of Marlborough?

1 A. Right.

2 Q. And do you remember how long it was that
3 you lived with your mother or your father the last
4 time?

5 A. No, I'd say less than six months.

6 Q. And before you moved there, where did
7 you move from? When you went to live back with
8 either your mother or father, where did you come
9 from?

10 A. I came from California.

11 Q. Whereabouts in California?

12 A. San Diego.

13 Q. Do you remember when it was that you
14 moved from San Diego?

15 A. No.

16 Q. Why did you leave San Diego?

17 A. Most of my family was here in New
18 England.

19 Q. Do you know when you got to San Diego?

20 A. No.

21 Q. Any idea how long you were there?

22 A. Less than two years I'd say.

23 Q. What, if anything, did you do when you

1 were there?

2 A. I don't recall.

3 Q. Did you have any jobs?

4 A. Yeah, I worked for a couple people
5 there.

6 Q. Doing what kind of stuff?

7 A. I worked for a Navy contractor.

8 Q. Do you remember what the Navy
9 contractor's name was?

10 A. National Seal and Finish.

11 Q. And what did they do?

12 A. They did just flooring. They did a
13 number of flooring projects on different ships for
14 the Navy.

15 Q. And what did you do for them, what was
16 your job?

17 A. I helped strip down and lay down
18 flooring.

19 Q. Do you remember who your boss was?

20 A. Scott Page.

21 Q. And where were they?

22 A. I'm not sure of the exact address.

23 Q. Do you remember what street they were

1 on?

2 A. I think it was 25th, but I'm --

3 Q. Were they on harbor?

4 A. No.

5 Q. They were in town?

6 A. Yes.

7 Q. Why did you leave there?

8 A. I moved.

9 Q. Back to either Marlborough or Keene?

10 A. No, I just moved to a different part --
11 moved from a different side of San Diego, moved
12 from one end of it to the other side.

13 Q. Okay, did you have any other jobs in San
14 Diego?

15 A. Yeah, I did a couple other jobs for --
16 well, I worked part time, like a temporary type of
17 deal like around here, it's called the Alpha
18 Project, and they send you out on jobs, it's a
19 nonprofit.

20 Q. And they were in San Diego?

21 A. Yes.

22 Q. The Alpha Project?

23 A. Yeah.

1 Q. Do you remember where they were in San
2 Diego?

3 A. 3rd Street.

4 Q. Okay, do you remember who you dealt with
5 there or who the boss was?

6 A. Yup, Robert McElroy (ph).

7 Q. And do they try to find you permanent
8 jobs?

9 A. Some businesses took on people -- I mean
10 yeah, they try to, yeah.

11 Q. Did you ever have any trouble at the
12 Alpha Project?

13 A. No.

14 Q. Okay. Do you remember where you were
15 living when you worked at the Alpha Project?

16 A. No.

17 Q. Any other jobs in San Diego? When I say
18 in San Diego, when you lived in San Diego, any
19 other jobs, whether it was in San Diego or not?

20 A. No.

21 Q. Do you remember where you lived in San
22 Diego?

23 A. No.

1 Q. Was it an apartment or house?

2 A. It was a house.

3 Q. By yourself or with someone else?

4 A. No, I lived with somebody else.

5 Q. Whom?

6 A. I'm not sure of their name.

7 Q. Just one other person or several people?

8 A. Several people.

9 Q. You all pay rent together?

10 A. No, I didn't really do much of anything.

11 Q. You just hung out?

12 A. Yeah, I worked some.

13 Q. Do you remember what you did when you
14 were in Portland for work?

15 A. Yeah, I did some odd jobs, worked at the
16 Taj Mahal Restaurant.

17 Q. And is that in Portland?

18 A. Yes, it is.

19 Q. What did you do there?

20 A. Food prep and dishwasher.

21 Q. Do you remember when you worked there?

22 A. No.

23 Q. Do you remember when you lived in

1 Portland, what the dates were?

2 A. No.

3 Q. But you went, just so it's clear, from
4 Portland you went to San Diego, is that right?

5 A. Right.

6 Q. And from San Diego you came back to New
7 Hampshire?

8 A. Right.

9 Q. And you're not sure whether you lived
10 with your mom or you lived with your dad?

11 A. When I got back?

12 Q. When you got back?

13 A. No, I lived with my father when I came
14 back.

15 Q. So you lived with your father when you
16 came back?

17 A. Right.

18 Q. And that's when you were working for
19 him?

20 A. Right.

21 Q. At the cemeteries?

22 A. Right.

23 Q. Did you live with your mother at any

1 time before you moved to Manchester after you'd
2 come back from Maine and California?

3 A. I can't say.

4 Q. Okay. Any idea when you went to Maine?

5 A. Yeah, in 1987.

6 Q. Do you remember when in '87?

7 A. Nope.

8 Q. Do you remember how long you were there?

9 A. In Maine?

10 Q. Yes?

11 A. No.

12 Q. Live anywhere other than Portland?

13 A. No, I didn't.

14 Q. Live anywhere in Portland other than
15 Spring Street?

16 A. Yeah, but I'm not sure what the name of
17 the street was.

18 Q. Do you remember where the Taj Mahal
19 Restaurant was?

20 A. No.

21 Q. And why did you leave there?

22 A. I moved.

23 Q. To California?

1 A. No, I moved to another address in
2 Portland.

3 Q. And you couldn't get from one place to
4 the other or --

5 A. Right.

6 Q. Did you have a driver's license?

7 A. No.

8 Q. Do you have one now?

9 A. No.

10 Q. Have you ever had a driver's license?

11 A. Yes.

12 Q. Have you ever had a driver's license any
13 place other than New Hampshire?

14 A. No.

15 Q. Okay, and when did you last have a
16 driver's license in New Hampshire?

17 A. 1992.

18 Q. And did it expire or was it revoked or
19 what?

20 A. It was revoked.

21 Q. Okay, and why was that?

22 A. A violation, motor vehicle violation.

23 Q. And what was it?

1 A. I'd rather not say.

2 Q. I think that it's relevant.

3 A. Well, I don't have my lawyer here so I'm
4 not going to get into that without his advice.

5 Q. Was there something involved in a court?

6 A. I can't say.

7 Q. Because you don't remember or you don't
8 want to say?

9 A. I don't want to say.

10 Q. Okay. Before Portland, Maine, where did
11 you live?

12 A. I was in Dover, New Hampshire.

13 Q. Do you remember where?

14 A. Nope. I know the name of the place, it
15 was the Dover Crisis Center.

16 Q. Dover Crisis Center?

17 A. Ah-hum.

18 Q. Do you know when you were there?

19 A. Sometime in 1987.

20 Q. Do you know where it's located?

21 A. No, I don't.

22 Q. Do you know how long you were there?

23 A. No, I don't.

1 Q. You don't even remember where it is in
2 Dover?

3 A. No, I don't.

4 Q. Okay, and do you remember how it was
5 that you came to be there?

6 A. Yeah, you mean how did I -- did somebody
7 suggest that to me or something?

8 Q. Sure.

9 A. Is that what you mean?

10 Q. Yeah.

11 A. No, nobody suggested it to me.

12 Q. It was your idea?

13 A. Right.

14 Q. Why did you think you needed to go to
15 the Dover Crisis Center?

16 A. Because I'm not sure exactly what day or
17 month it was in 1987, Gordon MacRae chased me out
18 of Keene, threatened me with a gun, and that was
19 the day I left Keene. I went to Manchester for
20 three days.

21 Q. Where were you?

22 A. I stayed on Elm Street.

23 Q. Where?

*Chase out
of town
version 1.*

1 A. With some friends, I don't know the
2 exact address on Elm Street.

3 Q. Do you remember what it's near?

4 A. Yeah, it's right on the corner of Queen
5 City Ave. and Elm Street.

6 Q. Do you remember what the -- was it a
7 house or an apartment?

8 A. It was a house.

9 Q. Do you remember what it looked like?

10 A. It sits right on the -- I mean there's a
11 school across the street, and right directly
12 across the street is the corner -- it sits right
13 just like this, and it's right on the corner.
14 It's right -- there are no other houses. Just
15 like Queen City Ave. runs like this, Elm Street
16 runs like this, the house sits right here on the
17 corner, it's the only house.

18 Q. And it faces the school?

19 A. Yeah, faces -- the front door faces.

20 Q. Do you remember what the name of the
21 school is?

22 A. No, I don't.

23 Q. Do you remember what the names of the

1 friends you went to live or stay with were?

2 A. No. I know their first names, but I
3 don't know what their last names were.

4 Q. What are their first names?

5 A. One was Al.

6 Q. Do you remember what Al looked like?

7 A. Yeah, tall, about six/two, brown hair,
8 caucasian.

9 Q. Do you remember how heavy?

10 A. Um, he was probably about 230.

11 Q. Any scars or marks that sort of
12 distinguished him?

13 A. No.

14 Q. Do you remember if he had long hair,
15 short hair?

16 A. Short.

17 Q. Did he have a beard or mustache?

18 A. No.

19 Q. Do you know where he lives now?

20 A. No, I've no idea.

21 Q. Okay, who else was at Elm Street when
22 you lived in Manchester those three days?

23 A. Dan.

1 Q. Do you remember Dan's last name?

2 A. No, I don't.

3 Q. Oh, by the way, do you have any idea how
4 old Al was at the time or how old he seemed?

5 A. No, I couldn't say, I'm not really -- I
6 wouldn't be able to say.

7 Q. More like twenties or thirties, or more
8 like forties or fifties?

9 A. He's between twenty and thirty.

10 Q. What about Dan, do you remember what
11 color his hair was?

12 A. Sandy.

13 Q. Long or short?

14 A. Short.

15 Q. Height -- my accent -- how tall was he?

16 A. Um, about five-feet-nine.

17 Q. Weight?

18 A. About 170.

19 Q. Scars, tattoos, facial hair, anything?

20 A. Mustache.

21 Q. And do you have any idea where he lives
22 now?

23 A. No.

1 Q. Okay, by the way, did Al work?

2 A. Yeah, but I'm not really -- I have no
3 idea where that was.

4 Q. Do you know what he did?

5 A. Nope.

6 Q. What about Dan, do you know if Dan
7 worked?

8 A. Yeah, Dan was -- did construction by
9 himself -- for himself.

10 Q. Do you know what he did in construction?

11 A. Yeah, remodeling.

12 Q. Did he have a business or a trade name
13 he went by, like Dan's Remodeling or Dan's
14 Service?

15 A. No, he just had side jobs.

16 Q. Anyone else living at Elm Street
17 whenever you went to live there those three days?

18 A. No.

19 Q. How did you know Dan or Al?

20 A. I knew them through the AA program.

21 Q. And where was it -- which AA program, do
22 you remember?

23 A. It wasn't a program, but through

1 meetings.

2 Q. Right, but do you remember where the
3 meetings were that you had met them?

4 A. No, I had seen them at a number -- in
5 the Manchester area, in Manchester.

6 Q. And that would have been at a time when
7 you'd lived in Manchester before?

8 A. Right, I knew them through AA meetings
9 before.

10 Q. Okay. But you can't remember where any
11 of those meetings were?

12 A. Well, there was a number of -- any one
13 that was taking place you can look at for whatever
14 year that was, where the meetings were taking
15 place usually, it wasn't just one place, I had
16 been to all of the locations that they had
17 meetings at.

18 Q. But do you remember where any of those
19 were?

20 A. No -- do I?

21 Q. Yes.

22 A. Not that I met them at.

23 Q. Do you remember where any of the

1 meetings were even if you don't know you met Al or
2 Dan at that meeting?

3 A. No, I don't know the exact addresses.

4 Q. Do you know what place they were, was it
5 a church or school?

6 A. Churches, yeah, school.

7 Q. Do you know which ones?

8 A. St. Catherine's Church.

9 Q. Do you remember where St. Catherine's
10 was or is?

11 A. Webster Street.

12 Q. Okay.

13 A. Some Congregational church on Elm
14 Street.

15 Q. Okay.

16 A. Sobriety Maintenance, Lakeshore
17 Hospital, Elliot Hospital, CMC Hospital, Tirrell
18 House, a Unitarian church on I think it's Brook
19 Street, workman's union on Brown Avenue or Cailiff
20 Road, I'm not sure, St. Raphael's Hall, I'm not
21 sure, that's off Front Street, but I'm not sure
22 whereabouts exactly that street is. Sobriety
23 Maintenance Center. Let's see, I think -- oh, and

1 a church, I'm not sure what type of church that
2 is, on the corner of Union and Hanover, that's
3 right across from Farnum Center, but I'm not sure
4 exactly what --

5 Q. Do you remember any friends or
6 acquaintances that you and Dan or you and Al had
7 in common who might know where Dan or Al are now?

8 A. I just know people by their first names
9 and it was never really any mention of anybody's
10 last name as far as the way the AA programs are
11 set up, it's not -- people don't usually refer to
12 each other, you know --

13 Q. Do you know where Dan lives now?

14 A. No, I don't.

15 Q. So, Gordon MacRae --

16 A. I knew Al lived in Manchester, I've seen
17 him before, but his exact address or anything like
18 that, I don't know.

19 Q. When you say you've seen him before,
20 you've seen him since you lived with him?

21 A. Yeah, since I was staying there.

22 Q. Okay --

23 A. Within this time period that I moved

1 back to Manchester, I've seen him.

2 Q. Okay.

3 A. But I don't know where he lives.

4 Q. Have you seen him at AA meetings?

5 A. No, I've seen him on the street -- well,
6 he drove by in a car, I saw him and his wife, but
7 --

8 Q. Do you know what her name is?

9 A. No.

10 Q. Now, when Gordon you said chased you out
11 of town with a gun --

12 A. Yes.

13 Q. -- when was that?

14 A. 1987.

15 Q. What month?

16 A. I'm not sure what month it was.

17 Q. Okay, was that the first time Gordon
18 ever chased you with a gun?

19 A. Yeah.

20 Q. It was the only time he ever chased you
21 with a gun?

22 A. Correct.

23 Q. Did you tell the police this?

1 A. Yeah.

2 Q. Okay, when?

3 A. In 1982 -- '92.

4 Q. Okay, who?

5 A. I talked to Det. McLaughlin.

6 Q. Where?

7 A. Keene Police Department.

8 Q. Was that the first time you talked to
9 Det. McLaughlin?

10 A. That I told him that?

11 Q. Yes.

12 A. I don't know what conversation it was
13 in.

14 Q. But you told him that Gordon had chased
15 you out of town with a gun?

16 A. Yes.

17 Q. How many times have you talked to Det.
18 McLaughlin?

19 A. I can't say, I don't know how many times
20 it was, more than five.

21 Q. More than five. You ever talk to Det.
22 McLaughlin anywhere other than the Keene Police
23 Department?

*Meeting
with McLaughlin
etc*

1 A. Well, you mean about the case?

2 Q. Or about you or anything?

3 A. Yeah, he came to Manchester and picked
4 me up at Hillsborough County Court and we drove
5 to, I think it's Centre Street in Concord to
6 Upton, Sanders & Smith where my attorney is, and
7 we had a meeting there.

8 Q. Do you remember how many times that
9 happened?

10 A. Just once I believe.

11 Q. Okay, when you had that meeting there,
12 you were present?

13 A. Yes, I was.

14 Q. And did Det. McLaughlin ask you
15 questions?

16 A. Yes, he did.

17 Q. Okay, and you answered his questions?

18 A. Yes, I did.

19 Q. Okay, was there any tape made of that
20 meeting, if you know?

21 A. I really can't -- I really don't
22 remember that much detail about that meeting.

23 Q. And when you say that was at your

1 attorney's office, that's Attorney Upton, Robert
2 Upton?

3 A. Yes, it is.

4 Q. And he represents you in a case you have
5 against Gordon MacRae and the Archdiocese?

6 A. No.

7 Q. How does he represent you?

8 A. There's no representation in that, there
9 has been no -- there's nothing filed against
10 MacRae.

11 Q. Okay, or the Archdiocese?

12 A. Right.

13 Q. Why do you have an attorney?

14 A. Why do I have an attorney?

15 Q. Yes.

16 MR. REYNOLDS: You may want to consult
17 with your lawyer before you answer the question.

18 A. Yeah, I think I should do that, too.

19 Q. Are you thinking about bringing a
20 lawsuit?

21 MR. REYNOLDS: You may want to ask your
22 lawyer before you answer that.

23 A. I can't answer that.

1 Q. When you had that meeting with Attorney
2 Upton and Det. McLaughlin, was anyone else present
3 other than you?

4 A. Yeah, Rob Upton and Det. McLaughlin.

5 Q. Okay, other than the three of you, was
6 anyone else present?

7 A. No.

8 Q. And during that meeting did someone call
9 Gordon MacRae?

10 A. Well, we had the initial conversation,
11 and then after the conversation Rob Upton went
12 back, because we were in the conference room, Rob
13 Upton went back to his office, me and Jim were
14 sitting in the conference room talking, and he
15 asked me if I minded trying to contact Gordon
16 MacRae at that time.

17 Q. And did you call him or did --

18 A. Yeah, I tried calling him.

19 Q. Did you reach him?

20 A. No, I didn't reach him.

21 Q. Did you ever speak to Mr. MacRae from
22 your attorney's office?

23 A. No, I didn't.

1 Q. Did you ever speak to Mr. MacRae on the
2 telephone when Mr. McLaughlin was present at any
3 point?

4 A. Yes, I did.

5 Q. Okay, where and when was that?

6 A. That was April of '93.

7 Q. So that's after you've told Det.
8 McLaughlin that there was some point in the past
9 when Mr. MacRae chased you out of town with a gun?

10 A. Excuse me?

11 Q. Okay, you had a meeting with Det.
12 McLaughlin in April of '93?

13 A. Right.

14 Q. And at that meeting you telephoned and
15 actually spoke to Mr. MacRae?

16 A. Yes.

17 Q. At some other time you had told Det.
18 McLaughlin that Mr. MacRae chased you out of town
19 with a gun at some point, is that right or wrong?

20 A. Right.

21 Q. And that meeting when you had told him
22 about Mr. MacRae chasing you out of town with a
23 gun, when did that meeting take place?

See again

1 A. I don't -- I'm not sure when that took
2 place.

3 Q. Was it before or after you talked to Mr.
4 MacRae on the telephone when Det. McLaughlin was
5 present?

6 A. I need about a few minutes.

7 Q. That's fine.

8 (Recess.)

9 (CONTINUATION OF INTERVIEW BY ATTORNEY DAVIS:)

10 Q. Ready to start up again, Mr. Grover?

11 A. Yeah.

12 Q. When you had that telephone conversation
13 with Mr. MacRae during which Det. McLaughlin was
14 present, that was in April of '93 you think?

15 A. Yes, it was.

16 Q. Now, that was before or after you had
17 told Det. McLaughlin about Gordon MacRae chasing
18 you out of town with a gun?

19 A. After.

20 Q. Do you remember when it was that you
21 told Det. McLaughlin that Gordon MacRae chased you
22 out of town with a gun?

23 A. I don't recall, it was in the first

Gell

1 couple meetings that we met.

2 Q. And do you remember when you met with
3 him the very first time?

4 A. Nope.

5 Q. Do you think it was in 1993?

6 A. Yeah, I'm pretty sure it was in 1993.

7 Q. Cold weather?

8 A. Yeah, it was in the first couple --
9 first three months of 1993.

10 Q. And where was that, the meeting, the
11 first meeting?

12 A. I'm not exactly sure where that first
13 meeting was.

14 Q. Where are the different places that
15 you've met with Det. McLaughlin?

16 A. Well, we met at the -- we met here at
17 this courthouse.

18 Q. Do you remember when that was?

19 A. 1993.

20 Q. Before or after April?

21 A. It was the day of the grand jury
22 meeting.

23 Q. Okay, so you met with Det. McLaughlin in

1 the courthouse the day of the grand jury?

2 A. Yeah, I talked with him.

3 Q. Other than that you met with him at the
4 Keene Police Department?

5 A. Keene Police Department, at Upton,
6 Sanders & Smith, and the time he met me at the
7 courthouse in Manchester to pick me up.

8 Q. Now, did he meet you to talk to you
9 there or you just agreed that he could pick you up
10 and drive you to Concord?

11 A. Yeah, he wanted to talk to me -- we had
12 the meeting, we were supposed to have it in
13 Manchester, didn't work out that way, so he just
14 picked me up in Manchester and brought me to
15 Concord.

16 Q. And as you all drove up -- did he also
17 drive you back from Concord that day?

18 A. Yes, he did.

19 Q. When you all drove up and back, did you
20 talk about the case?

21 A. Yes.

22 Q. Do you know if at any time you talked to
23 Det. McLaughlin, if he ever taped anything you had

1 to say?

2 A. Not that I was aware of.

3 Q. Okay.

4 A. Yeah, well, yeah, he taped a
5 conversation between MacRae and myself.

6 Q. That happened one time?

7 A. Yes.

8 Q. Okay, and that's when you were at the
9 Keene PD?

10 A. Yes.

11 Q. And Det. McLaughlin is the one that did
12 the taping?

13 A. Yes, it was his phone and the Keene
14 Police Department's taping machine, he put it on
15 the phone.

16 Q. Okay. During that conversation do you
17 know if the entire conversation was taped?

18 A. Yeah, I believe yes, it was.

19 Q. Okay, have you ever made a written
20 statement -- go ahead?

21 A. What conversation are you talking
22 about?

23 Q. I'm sorry --

1 A. The one on the phone with MacRae,
2 between me and MacRae, that was taped at the
3 time.

4 Q. At which Det. McLaughlin was present?

5 A. Right.

6 Q. That entire -

7 A. The conversation between me and MacRae
8 -- the conversation that took place in the room
9 that day wasn't taped, just the conversation, the
10 phone conversation.

11 Q. I understand, when you just talked to
12 Jim McLaughlin, that wasn't taped?

13 A. Right, that wasn't taped.

14 Q. But when you talked to Mr. MacRae on the
15 telephone and Mr. McLaughlin was present, the tape
16 was running?

17 A. Yes. It was

18 Q. Other than Det. McLaughlin, have you
19 talked to any other police officers about any of
20 these allegations?

21 (Pause.)

22 A None

23 0. And -- go ahead?

1 A. I spoke with Brian. What's Brian's last
2 name?

3 MR. REYNOLDS: Clark.

4 A. Clark, but no detail about -- I mean he
5 came to Manchester the other day.

6 Q. Is that the first time you spoke to him?

7 A. Yes -- well, no, I spoke to him on the
8 phone, he asked me to -- yeah, okay, I had spoke
9 to him about the case, he asked me to sign the
10 consent forms to Derby Lodge, Farnum Center,
11 Tirrell House, all those institutions, Beech Hill,
12 he wanted me to get a release of information, we
13 talked about that.

14 Q. Did you sign those?

15 A. Yes, I did sign them.

16 Q. Do you know when that was?

17 A. No, it was months ago, I don't know
18 exactly which month or anything.

19 Q. Okay.

20 A. It was in 1994.

21 Q. Possibly May?

22 A. Possibly.

23 Q. And you signed them for Tirrell House?

1 A. Tirrell House, Farnum Center, Sobriety
2 Maintenance, Derby Lodge and Beech Hill, the same
3 ones -- basically the same -- yeah, those I
4 signed.

5 Q. Okay, and did you talk to Officer Clark
6 about the case any at that point or he just said
7 he needed these releases?

8 A. He said that he -- yeah, he needed
9 releases because of such and such, I don't
10 remember exact words, but, yeah, he referred to
11 the case.

12 Q. Do you remember why it was he was
13 telling you he needed them even though you don't
14 remember his exact words?

15 A. Why he needed them?

16 Q. Or why he wanted them?

17 A. They just wanted the information.

18 Q. And you were willing to sign those
19 releases?

20 A. Yes, I was -- well, I had spoke to my
21 lawyer first.

22 Q. Attorney Upton?

23 A. Right, they had sent him a copy of what

1 they wanted and sent me a copy, and he said it was
2 okay for me to sign.

3 Q. And then you talked to Officer Clark
4 just within the last week or two?

5 A. Right.

6 Q. Okay, and what did you all talk about
7 then?

8 A. He came over to Manchester and was
9 concerned about -- I had had -- since I don't have
10 a license I had trouble finding a ride or finding
11 transportation over here to meet with Attorney
12 Reynolds.

13 Q. Okay.

14 A. And he was offering -- trying to make
15 arrangements to get me over here, to get me to
16 Cheshire County Court.

17 Q. Did he also actually talk about the case
18 or did you talk to him about what had happened in
19 the past?

20 A. Um, let's see, we talked about that and
21 --

22 . (Pause.)

23 A. No, I don't believe -- no, I didn't talk

1 to him about any details of the case.

2 Q. Other than Officer Clark and Det.

3 McLaughlin, have you talked to any other police
4 officers about any of the things that you say that
5 Gordon MacRae did that was wrong?

6 A. No.

7 Q. Okay. Have you talked to any other
8 police officers about anyone else whoever
9 physically or sexually assaulted you?

10 A. Did I talk -- did I talk --

11 Q. Let me repeat the question, maybe I can
12 put it in English.

13 MR. REYNOLDS: I warned you about him.

14 Q. I know you've talked to Det. McLaughlin
15 in some detail about things that you say that
16 Gordon MacRae did, that's right?

17 A. Right.

18 Q. And you've talked a little bit about
19 some of the same things, but not a whole lot, with
20 Officer Clark?

21 A. Right.

22 Q. Have you ever talked to any police
23 officer about anyone other than Gordon MacRae ever

1 physically or sexually assaulting you?

2 A. No.

3 Q. Okay. Do you think anyone other than
4 Gordon MacRae ever has physically or sexually
5 assaulted you?

6 A. Yeah, I've been physically assaulted.

7 Q. Okay, like there were fights or things
8 like that?

9 A. Yeah -- no, I was beat up in Manchester.

10 Q. When was that?

11 A. I'm not sure of the year. I don't know
12 what the year was.

13 Q. Was that before or after you hurt your
14 leg and you had to have that surgery?

15 A. Before.

16 Q. Was it when you were living in
17 Manchester the first, second or third time?

18 A. The first time.

19 Q. Okay.

20 A. It was after the time that I was at
21 Tirrell House the first time.

22 Q. Okay. And did you talk to Det.

23 McLaughlin about that time you got beat up?

1 A. Yes, I did.

2 Q. Other than Det. McLaughlin, have you
3 talked to any other policemen about that?

4 A. No other policemen.

5 Q. Okay, do you think anyone other than Mr.
6 MacRae ever sexually assaulted you?

7 A. No.

8 Q. Okay. You may recall that we were going
9 through where you had lived and when, and we got
10 to the point where you lived in Portland?

11 A. Right.

12 Q. And let me just make sure that I've got
13 the order right, before Portland you were at the
14 Dover Crisis Center, is that right?

15 A. Correct.

16 Q. You think that was in 1987?

17 A. Yes.

18 Q. You're not sure how long you were there?

19 A. No.

20 Q. You came there from Manchester, and
21 you'd been in Manchester for three days?

22 A. Right.

23 Q. Living with Al and Dan?

1 A. Right.

2 Q. Did you tell Al and Dan about Mr. MacRae
3 threatening you or chasing you with a gun?

4 A. No.

5 Q. Did you tell anyone about that until you
6 told Det. McLaughlin about that in 1993?

7 A. From the time --

8 Q. From when it happened -- you don't
9 remember the exact date --

10 A. I only told two people up to that point,
11 and that was Det. McLaughlin and my counselor
12 Debbie at when I was at Derby Lodge.

13 Q. Is that Debbie Collette (ph)?

14 A. I couldn't recall what her last name
15 was.

16 Q. She worked with you at Derby Lodge?

17 A. Yes, she did.

18 Q. Do you remember when you were there?

19 A. Do I remember?

20 Q. Yes.

21 A. Yeah, I remember when I was there.

22 Q. When was that?

23 A. Oh, a date I was there?

1 Q. Yes.

2 A. No, I don't remember that.

3 Q. Do you remember how long you were there?

4 A. No, I don't remember how long that was.

5 Q. Do you remember how old you were then?

6 A. No, I don't remember how old I was
7 either.

8 Q. Okay, but you told Debbie, whatever her
9 last name is, that Mr. MacRae had threatened you
10 with a gun or chased you out of town?

11 A. No, we didn't talk about that part, just
12 briefly said somewhere in the conversation
13 something came up about different types of abuse,
14 and I told her that I had been sexually abused
15 before, and then I -- in the first conversation or
16 the first part of the conversation I said that and
17 didn't say anything, didn't make reference to who
18 it was until later on in the conversation. It
19 wasn't like I just came out and said, well, Gordon
20 MacRae sexually assaulted me, I said I had been
21 sexually assaulted, we talked about it, and talked
22 about, you know --

23 Q. How it had happened?

1 A. Not really how it happened but how to
2 deal with different -- it was more -- the
3 counseling session is more of how to deal with
4 different situations or different addictions and
5 every day life.

6 Q. But you told Debbie?

7 A. Right.

8 Q. That Gordon had been the person who
9 assaulted --

10 A. Right.

11 Q. You're sure of that?

12 A. Right.

13 Q. How many times do you think you met with
14 Debbie?

15 A. I'm not sure exactly how long it was,
16 all I remember was one day she was either fired or
17 removed from her position for whatever reason that
18 was, but she left the job.

19 Q. Do you know the reason she was
20 dismissed?

21 A. No, I have no idea.

22 Q. Okay.

23 A. Even if she was -- I'm not even sure if

1 she was dismissed. She might have just left on
2 her own. I don't know any details except she was
3 gone.

4 Q. And this was at Derby Lodge in Berlin?

5 A. Right.

6 Q. Did you tell anyone else --

7 A. No.

8 Q. -- other than, let me get the question
9 out first, did you tell anyone else other than
10 Debbie Collette (ph) -- excuse me, other than
11 Debbie and Det. McLaughlin about Mr. MacRae
12 sexually assaulting you?

13 A. Between the time it happened and the
14 first conversation I had with Det. McLaughlin?

15 Q. Yes.

16 A. Yeah, I did.

17 Q. Who else did you tell?

18 A. I had spoke -- no -- no, I hadn't, I
19 hadn't spoke to anybody. I spoke to her first,
20 and then the years went by, I spoke to -- yeah, I
21 said something -- no, I spoke to Det. McLaughlin,
22 and then I spoke to some other people.

23 Q. Who are the other people?

1 A. I called my mother and told her that I
2 had spoke to Det. McLaughlin and that was it,
3 didn't say about what, didn't talk about
4 anything. I'm not sure if it was whose idea it
5 was, but they said I should talk to Bill Cleary,
6 who was already familiar with what was going on.

7 Q. When you say they, either your mother or
8 Det. McLaughlin or both?

9 A. Right, I can't say, I don't know.

10 Q. It was one or the other?

11 A. Right.

12 Q. Okay.

13 A. I'm not sure if it was --

14 Q. And you talked to Bill Cleary?

15 A. Right, I talked to Bill Cleary.

16 Q. And you've obviously, I assume, talked
17 to Robert Upton?

18 A. Right.

19 Q. Okay, anyone else?

20 A. I talked to Devine & Millimet, Don
21 Dufresne and his, I'm not sure exactly what she is
22 to him, an aide or something, she was in the room.

23 Q. Did they represent you at some time?

1 A. No, they were representing me and Upton,
2 Sanders & Smith for the civil suit MacRae has
3 filed against me.

4 Q. And you've talked to the grand jury?

5 A. Right.

6 Q. And you talked to Attorney Reynolds?

7 A. Right.

8 Q. Other than that have you talked to
9 anyone else?

10 A. I talked to some guy, an attorney named
11 Peter at Wiggins and something, or something and
12 Wiggins.

13 Q. Wiggin & Nourie?

14 A. Yeah, I talked to Peter something.

15 Q. Because he was maybe going to represent
16 you, or why?

17 A. No, under the advice of Bill Cleary.

18 Q. This is before you had Attorney Upton?

19 A. Right.

20 Q. Anyone else that you've talked to about
21 what Gordon MacRae did?

22 A. Besides -- I mean besides -- yeah, I
23 have talked to other people.

1 Q. Whom?

2 A. Do I have to answer that?

3 MR. REYNOLDS: I think you may want to
4 talk to your lawyer before you answer the
5 question.

6 A. All right.

7 Q. Can you tell me the names of any other
8 people you talked to other than the ones you've
9 already identified about what Gordon MacRae did?

10 A. No, I can't.

11 Q. But everyone that you talked to --
12 forget this question, I'm going to start over.
13 Debbie at Derby Lodge was the first person you
14 talked to about these things that Gordon MacRae
15 did that were wrong?

16 A. Right.

17 Q. And after you talked to Debbie you
18 didn't tell anyone else about it until you spoke
19 to Det. McLaughlin, is that right?

20 A. Right.

21 Q. You're not sure of the exact date, but
22 it was in early 1993 when you talked to Det.
23 McLaughlin?

1 A. Right, right.

2 Q. Okay. And then after you talked to Det.
3 McLaughlin, you told your mother?

4 A. I didn't tell her per se, I mean I
5 wasn't like -- I didn't say, well, this and this
6 and this happened, I just said that I had
7 contacted Det. McLaughlin and had spoke to him
8 about what had happened, outside of that it wasn't
9 like I said, well, this is what happened on such
10 and such a date, or this, this, this.

11 Q. You didn't give her all the details?

12 A. Right, I didn't.

13 Q. But when you talked to your mother --

14 A. About what happened --

15 Q. -- did you say about Gordon MacRae, or
16 about the fact that Gordon MacRae did something to
17 me, the best you can remember, what kind of words
18 did you use?

19 A. I just said that I talked to Det.
20 McLaughlin about what happened, it wasn't like she
21 didn't know what was going on, my brother had
22 already been to the grand jury and they had been
23 doing an investigation beforehand, so.

1 Q. This is your brother Jon?

2 A. Correct.

3 Q. And how did you know that Jon had
4 already been to the grand jury?

5 A. Well, let's see -- well, the first
6 person let me know that he was going, it was two
7 days before he was supposed to appear in court on
8 it.

9 Q. And who was that?

10 A. Who? Jon was supposed to appear.

11 Q. So Jon let you know that he was going to
12 go talk to --

13 A. No, my mother told me that my brother
14 Jon was going to be appearing in two days to meet
15 with the grand jury.

16 Q. And did she say about what?

17 A. Just about concerning Gordon MacRae.

18 Q. She say what about Gordon MacRae?

19 A. No details.

20 Q. Okay. What was the next thing you
21 heard?

22 A. Next thing I heard was on the media or
23 whatever was said about him being indicted.

1 Q. And do you remember, radio, television,
2 newspaper?

3 A. I'm not sure.

4 Q. Do you read a newspaper?

5 A. Yes, I do.

6 Q. Which one?

7 A. I used to get the Union Leader.

8 Q. Okay, do you think you read about it in
9 the Union Leader?

10 A. I'm not sure.

11 Q. Okay, so you somehow heard about it on
12 the media, was that before or after you talked to
13 Det. McLaughlin?

14 A. I think it was right in the same time
15 frame as when it was -- I can't say because I
16 don't remember.

17 Q. So you knew from your mother that your
18 brother was going to testify in front of the grand
19 jury regarding Gordon MacRae?

20 A. Right.

21 Q. That was before you talked to Det.
22 McLaughlin?

23 A. Right.

1 Q. Did you talk to your brother?

2 A. No.

3 Q. Okay. Did you talk to anyone else?

4 A. No.

5 Q. Did she say why your brother was going
6 to talk to the grand jury about Gordon MacRae?

7 A. No.

8 Q. Okay, she didn't say what, if anything,
9 it had to do about?

10 A. I can't -- I don't remember the
11 conversation well enough to say.

12 Q. How often -- was this in person or on
13 the phone?

14 A. Phone.

15 Q. How often do you and your mother talk on
16 the phone?

17 A. I think I called her two months ago, a
18 month ago.

19 Q. Okay.

20 A. Maybe once a month, if that.

21 Q. And she called you to let you know that
22 Jon was going to testify in front of the grand
23 jury?

1 A. No, I just happened to call.

2 Q. It just came up in conversation?

3 A. Right -- it had been a while, I don't
4 know, a month or so had gone by, I hadn't had -- I
5 don't really have too much contact with my family,
6 I called up, she said do you know in two days that
7 your brother is going to be going before the grand
8 jury about Gordon MacRae, that's the best I can --

9 Q. And what was your answer?

10 A. What was my answer?

11 Q. When she asked do you know?

12 A. Oh, no, she asked me -- she asked me if
13 I knew -- I can't really say how she worded it,
14 but she was looking for something.

15 Q. Was she trying to find out if you knew
16 that your brother was going to the grand jury?

17 A. I don't recall.

18 Q. Do you think she was trying to find out
19 whether you had ever been assaulted or attacked by
20 Mr. MacRae?

21 A. I don't really -- I don't know, I don't
22 remember the conversation well enough just to, you
23 know, you think that someone is trying to get at

1 something.

2 Q. How did -- when you talked to Det.

3 McLaughlin the first time, was it because you had
4 found him or he found you or do you remember how
5 it happened?

6 A. Yeah, I called him on the phone and told
7 him that I wanted to make an appointment to meet
8 with him.

9 Q. And how did you know to call him?

10 A. Because my mother had already said who
11 was taking care of it at the time.

12 Q. She give you the telephone number?

13 A. To the Keene Police Department, no, I
14 looked it up in the phone book.

15 Q. You were in Manchester when you called?

16 A. Yes.

17 Q. That was after you talked to your mother
18 about the fact that your brother was going to go
19 testify in front of the grand jury or was it after
20 that?

21 A. I think it was. She said something two
22 days before he was going to go the grand jury -- I
23 didn't say anything to Det. McLaughlin until after

1 the grand jury had already indicted him. At that
2 point in my mind I knew that it was possible that
3 he could be convicted.

4 Q. On Jon's charges or on yours?

5 A. On mine.

6 Q. Did you know anything about Jon's
7 charge?

8 A. I still don't, no, I don't now or never.

9 Q. And you haven't ever talked to Jon about
10 any of this?

11 A. No, as far as details of his case and my
12 case, we have never exchanged any information
13 about anything.

14 Q. You all ever talked about it any?

15 A. Yeah.

16 Q. Okay, when?

17 A. About -- when is the last time, today,
18 this morning.

19 Q. Okay, and was anyone else present?

20 A. No, no.

21 Q. How many times before that, do you know?

22 A. Have I talked to him?

23 Q. Yes, about his case or your case or --

1 A. The only thing we've ever talked about
2 is the delays and whatever, appeals or things like
3 that that have come up, anything that was in the
4 paper pretty much, appeals, continuances, but
5 never any information -- I mean I never said,
6 well, Jon, this is what happened to me, or he
7 never said, well, this is what happened to me or
8 have you ever been to this place or that place or
9 anything like that, never had any conversation
10 about that.

11 Q. And that includes today?

12 A. Right.

13 Q. Okay. Other than Debbie at the Derby
14 Lodge, have you ever told any other counselor or
15 psychiatrist or psychologist that you were ever
16 sexually abused, irrespective of whether you gave
17 the name of the person?

18 A. Yeah, I called Pauline Goupil and Ram
19 Yaditi.

20 Q. You told both of them?

21 A. Yeah.

22 Q. Okay, any other psychiatrist or
23 counselors that you've told?

1 A. No.

2 Q. Okay. I want to go back, you were run
3 out of town by Gordon with a gun?

4 A. Right.

5 Q. That was in 1987, do you remember what
6 month or what time of the year?

7 A. Yeah, it was summertime.

8 Q. Okay, do you remember what month?

9 A. No.

10 Q. Anybody else ever threaten you with a
11 gun?

12 A. No.

13 Q. Okay, what kind of gun was it?

14 A. A handgun.

15 Q. Do you know what color the metal was?

16 A. No, not offhand.

17 Q. Do you know what kind of handgun it was?

18 A. Yeah, he had two handguns.

19 Q. Okay, the one he used to threaten you,
20 what did it look like?

21 A. Revolver.

22 Q. You don't know what caliber?

23 A. No.

1 Q. Do you know what make, like Smith &
2 Wesson, Colt?

3 A. No.

4 Q. Could you describe the way it looked?

5 A. Just -- I'm not really good at -- no, I
6 couldn't. I have seen it, I mean I've been in his
7 room and seen it.

8 Q. And where did he keep it in his room?

9 A. Right on his -- well, at different times
10 it's been on his bookshelf in his room, along with
11 his, whatever position he held in Baltimore,
12 Baltimore Police Department, he had a badge and a
13 holster and two handguns, and he kept those
14 together.

15 Q. He kept them both in a holster or just
16 one of them?

17 A. Just one of them.

18 Q. Was the one he threatened you with, the
19 one he kept in the holster?

20 A. Yes, it was.

21 Q. Okay.

22 A. It was short, it was a revolver. I
23 think it was dark in color. It was short-nosed.

1 Q. Do you know if it's the kind that has a
2 cylinder or bullets in the center or did it have a
3 clip in the handle?

4 A. No, the one he had that day was a
5 revolver, cylinder.

6 Q. Where was it that he threatened you,
7 where were you?

8 A. On Washington Street.

9 Q. Okay, whereabouts?

10 A. Near the corner of -- I'm not sure
11 exactly -- I'm not sure of that street going
12 across, I think that's High Street, I'm not sure.
13 Is that the one that's across the street from
14 Roosevelt School, whatever that street is, across
15 from Roosevelt?

16 Q. Roosevelt or Franklin?

17 A. Franklin on Washington Street, whatever
18 that -- I think it's High Street, I'm not sure if
19 that's High.

20 Q. How did he come up to you?

21 A. In his car.

22 Q. Okay, what was he driving?

23 A. I'm not sure if he still had his Subaru

1 at that point or if he had already gotten a
2 different car.

3 Q. So he had a Subaru at one point?

4 A. Yeah, at one point. I'm not sure if he
5 still had -- I don't recall.

6 Q. Do you remember what color the car was?

7 A. No.

8 Q. When he had the Subaru, do you remember
9 what color it was?

10 A. Yeah, it was a -- it was a certain kind
11 of yellow, I wouldn't know how -- dull yellow
12 color.

13 Q. And two or four-door, or do you
14 remember?

15 A. Four-door.

16 Q. Station wagon or like a sedan?

17 A. I don't know, kind of like an economic
18 car, not really a sedan, not big like you would
19 think it as a sedan.

20 Q. But it wasn't a station wagon?

21 A. Right.

22 Q. It had four doors?

23 A. Right.

1 Q. So he drove up to you on Washington
2 Street somewhere near the Franklin School?

3 A. Right.

4 Q. And what did he say or do, just give us
5 the details of what happened?

6 A. Well, earlier in the day -- I had been
7 living with MacRae -- early in the day -- I was
8 living up on Summit Road with him.

9 Q. In his apartment?

10 A. Right, in his apartment.

11 Q. And how long had you been living with
12 him?

13 A. I can't say, I don't know.

14 Q. You think it was like a week, a month, a
15 year?

16 A. I don't know, it was days. How many
17 days that was, I'm not really sure.

18 Q. But you had been living with MacRae,
19 then what happened?

20 A. One morning he woke up, said he had to
21 -- he said he had to go to Boston or
22 Massachusetts, I think he said Boston, though, it
23 was pretty early in the morning, he said he had a

1 couple things for me to do while he was gone and

2 --

3 Q. Such as?

4 A. Like pick up and take some laundry and,
5 you know, take care of those things around the
6 house, and then he got ready and left. I was
7 sitting watching TV, it was still fairly early --
8 well, it was still fairly early in the morning and
9 he came back and he said he had to do something or
10 drop this off, and he brought in a steel etagere
11 case, big stainless steel type of case, he brought
12 that in, put it behind the couch, went in his
13 bedroom, got something, and then left again.
14 About, I don't know, roughly an hour after he left
15 I -- in between that I ate and did all that stuff,
16 got changed and stuff, I saw -- when I got ready
17 to walk out the door, I glanced down to my
18 left-hand side and remembered that he had put the
19 case there. I took the case out, put it on the
20 couch, wondered what was inside the case. I
21 opened the case up and in there there were a
22 number of video cassettes along with a camcorder.
23 I took one of the video cassettes and put it in

1 his VCR, started watching it, and at that point I
2 came across some child pornography. I looked at
3 it roughly 15 seconds, whatever, it wasn't -- it
4 was seconds.

5 Q. What do you mean seconds?

6 A. I mean it was like -- I watched it --

7 Q. Oh, you mean you just watched it for
8 seconds?

9 A. Thought I recognized a person on there.

10 Q. Who did you think you saw?

11 A. I thought it was Tony, I'm not sure,
12 I've forgotten what Tony's last name was.

13 Q. Okay.

14 A. Then I got scared, I grabbed the tapes
15 out of the case, closed the case, put it behind
16 the couch, ran in the room, grabbed a gym bag off
17 his floor. There was a blue gym bag with some, I
18 don't know if they were dirty or clean clothes in
19 the gym bag, I took the video cassettes, threw
20 them in there, went to his dresser, grabbed all
21 the film and all because he had some 35 millimeter
22 cameras, too, and some disk cameras. I grabbed
23 that material, put it in the bag, grabbed

1 something else, put that in the bag and ran out
2 the door -- shut the door, and ran out the door,
3 got on my bike, road to my mother's house -- well,
4 no, actually I went through the cemetery, waited
5 in the cemetery for, I don't know, roughly an
6 hour.

7 Q. Which cemetery?

8 A. The one right across from where he
9 lives, I'm not sure of the name of that, it's on
10 Summit Road up by -- I'm not sure if that's Park
11 Ave.

12 MR. REYNOLDS: Probably.

13 A. By Yankee Lantern.

14 Q. Okay, I understand that, you waited
15 there for a while, then what did you do?

16 A. Roughly an hour trying to decide what I
17 was going to do. At that point the only thing I
18 had left really to take that stuff to, I brought
19 it to my mother's house.

20 Q. Where was that?

21 A. On Butternut Drive.

22 Q. Okay, and what did you do with it at
23 your mother's house?

1 A. I went in the front door.

2 Q. Was anyone there?

3 A. Yes, somebody was there, the doors were
4 unlocked.

5 Q. Who was there?

6 A. I can't remember, I don't recall who it
7 was at the house.

8 Q. But you didn't have a key?

9 A. Right, I wasn't supposed to be there at
10 that time.

11 Q. Just because it wasn't okay with your
12 mother or there was a restraining order or what?

13 A. Right, no, just my mother.

14 Q. Okay, so somebody was there, they let
15 you in?

16 A. No, I just walked in.

17 Q. What did you do then?

18 A. Well, took the gym bag downstairs, put
19 it in -- we have a cellar, like a wash -- we have
20 our washer and dryer -- we have a downstairs room
21 where our washer and dryer is and a storage area
22 on one side and like that, and just kind of like a
23 storage place where we do our laundry, I went in